## UNITED STATES DISTRICT COURT DISTRICT OF MAINE

BRIAN THOMPSON,	)
Plaintiff,	)
v.	) Case No. 2:22-cv-00060-NT
JOHNSON CONTROLS, INC.	)
Defendant	)

## PLAINTIFF'S CONSENT MOTION TO EXTEND TIME

Plaintiff Brian Thompson, by and through undersigned counsel, hereby moves with the consent of Defendant to extend the time to file a stipulation of dismissal in the above-captioned case. Good cause exists to grant the extension of time sought for the following reasons:

- 1. The parties have reached a settlement in this case but need an additional 45 days to finalize the settlement.
  - 2. The deadline to file a stipulation of dismissal expires today.
- 3. The parties anticipate that they will be able to file a stipulation of dismissal by December 14, 2023.
  - 4. Defendant joins in and consents to this Motion.

WHEREFORE, Plaintiff requests that the Court grant a 45-day extension of the time to file a stipulation of dismissal in the above-captioned case until December 14, 2023. Respectfully submitted,

Dated: October 30, 2023 /s/ Laura H. White

Laura H. White, Esq. (Bar No. 4025) Attorney for Plaintiff WHITE & QUINLAN, LLC 62 Portland Road, Suite 21 Kennebunk, Maine 04043 (207) 502-7484 lwhite@whiteandquinlan.com

## **CERTIFICATE OF SERVICE**

I, Laura H. White, hereby certify that on this  $30^{\rm th}$  day of October, 2023, I served the foregoing Plaintiff's Consent Motion to Extend Time with the Court's CM/ECF system, which automatically sends notification to all counsel of record.

Dated: October 30, 2023 /s/ Laura H. White

Laura H. White, Esq. (Bar No. 4025) Attorney for Plaintiff WHITE & QUINLAN, LLC 62 Portland Road, Suite 21 Kennebunk, Maine 04043 (207) 502-7484 lwhite@whiteandquinlan.com